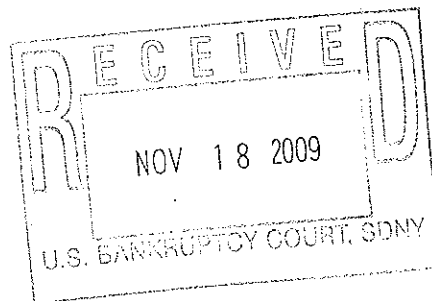


**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**



In re:

BERNARD L. MADOFF,

Debtor

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

Adv. Pro. No. 08-01789 (BRL)

SIPA Liquidation
(Substantively Consolidated)

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

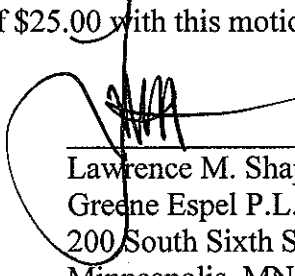
MOTION FOR ADMISSION TO PRACTICE, *PRO HAC VICE*

I, Lawrence M. Shapiro, request admission, *pro hac vice*, before the Honorable Burton L. Lifland, to represent Marion E. Apple, the beneficiary of an Individual Retirement Account of the same name, in the above-referenced adversary proceeding.

I certify that I am a member in good standing of the bar in the State of Minnesota and, if applicable, the bar of the U.S. District Court for the District of Minnesota.

I have submitted the filing fee of \$25.00 with this motion for *pro hac vice* admission.

Dated: November 17, 2009



Lawrence M. Shapiro, P.A.
Greene Espel P.L.L.P.
200 South Sixth Street, Suite 1200
Minneapolis, MN 55402
LShapiro@GreeneEspel.com
(612) 373-8325